

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:23-cv-23559-RAR

HOWARD MICHAEL CAPLAN,

Plaintiff,

v.

TOPS R US LLC, a Florida Limited
Liability Company, and CARMELA
RAFFA, as Trustee of the Marital Trust
Created under the Steve Raffa Amended
and Restated Revocable Trust Agreement,

Defendants.

/

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE

Plaintiff and Defendants, by and through their respective undersigned counsel, pursuant to Fed. R. Civ. P. 41, hereby stipulate to the dismissal of this action with prejudice, with each party to bear their own attorney's fees and costs.

Dated: December 6, 2023

Respectfully submitted,

s/Ronald E. Stern, Esq.

Ronald E. Stern, Esq.
Florida Bar No. 10089
The Advocacy Law Firm, P.A.
1250 East Hallandale Beach Blvd., Suite 503
Hallandale Beach, FL 33009
Tel: (954) 639-7016
Fax: (954) 639-7198
E-Mail: ronsternlaw@gmail.com
Counsel for Plaintiff

s/ Adam S. Chotiner¹

Adam S. Chotiner, Esq.
FL Bar No. 0146315
Shapiro, Blasi, Wasserman
& Hermann, P.A.
7777 Glades Road, Suite 400
Boca Raton, FL 33434
Tel: (561) 477-7800
Fax: (561) 477-7752
E-Mail: achotiner@sbwh.law
Counsel for Defendants

¹ Ronald E. Stern has provided Adam S. Chotiner with express authority to jointly file this stipulation.

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the Service List below via transmission of Notices of Electronic Filing generated by CM/ECF or via email.

s/ Adam S. Chotiner
ADAM S. CHOTINER, ESQ.

SERVICE LIST

Howard Michael Caplan v. Tops R US LLC and Carmela Raffa as Trustee of the Marital Trust created under the Steve Raffa Amended and Restated Revocable Trust Agreement
Case No. 1:23-cv-23559-RAR
United States District Court, Southern District of Florida

Ronald E. Stern, Esq. E-Mail: ronsternlaw@gmail.com Ronnette Gleizer, Esq. E-Mail: advocacylawfirmpa@gmail.com The Advocacy Law Firm, P.A. 1835 East Hallandale Beach Boulevard Suite 757 Hallandale Beach, FL 33009 Tel: (954) 639-7016 Fax: (954) 639-7198 Counsel for Plaintiff <i>Via CM/ECF</i>	Adam S. Chotiner, Esq. E-Mail: achotiner@sbwh.law Shapiro, Blasi, Wasserman & Hermann, P.A. 7777 Glades Rd., Suite 400 Boca Raton, FL 33434 Tel: (561) 477-7800 Fax: (561) 477-7722 Counsel for Defendants <i>Via CM/ECF</i>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------